

# Exhibit 1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----x  
ROBERT BARTLETT, *et al.*, :  
: Plaintiffs, : **Case No. 19-cv-7 (CBA)(TAM)**  
: :  
-against- :  
: :  
SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN SAL, :  
*et al.*, :  
: :  
Defendants. :  
-----x

**[PROPOSED] ORDER PERMITTING USE OF RECORDS  
PRODUCED IN THIS CASE IN OTHER CASES**

Upon consideration of Plaintiffs' motion for leave to provide records produced by third parties KBC Bank and Standard Chartered Bank in response to subpoenas issued in this case to plaintiffs in *Freeman v. HSBC Holdings plc*, No. 14-cv-6601 (PKC) (CLP) (E.D.N.Y.), *Freeman v. HSBC Holdings plc*, No. 18-cv-7359 (PKC) (CLP) (E.D.N.Y.), and *Stephens v. HSBC Holdings plc*, No. 18-cv-7439 (PKC) (CLP) (E.D.N.Y.) (together, the "*Freeman Actions*") and to utilize information in those records in amended complaints in the *Freeman Actions* to reflect:

- (1) the names of the alleged Hezbollah-affiliated entities and individuals in the transaction summaries;
- (2) the names of the *Freeman* defendants which held the relevant accounts;
- (3) the dollar amounts of the transactions processed on behalf of the relevant Hezbollah-affiliated customers between 2003-2011; and
- (4) transactional dates.

It is hereby **ORDERED** that Plaintiffs' motion is GRANTED.

The *Freeman* Action plaintiffs are expected to take reasonable steps to treat the records with the same level of protection required under the Protective Order entered in this case, ECF No. 273, subject to any modifications ordered by the Court in the *Freeman* Actions.

Dated: \_\_\_\_\_, 2023

---

TARYN A. MERKL  
United States Magistrate Judge